

EXHIBIT LIST

EXHIBIT A

Settlement Agreement

EXHIBIT B

Sworn Declaration Pursuant To 28 U.S.C.A. § 1746
Daniel P. McAnally, Plaintiffs Attorney

Exhibit A

Exhibit A

SETTLEMENT AGREEMENT and RELEASE

THIS SETTLEMENT AGREEMENT ("Agreement") is made and entered into on January 11, 2012 between the Trustees of the Iron Workers Tri-State Welfare Fund("Trust Fund") and Area Erectors, Inc. ("Area").

RECITALS

WHEREAS, Area is signatory to multiple collective bargaining agreements with different Local Unions affiliated with the International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers Union, AFL-CIO; and

WHEREAS, the collective bargaining agreement and trust agreements require Area to submit monthly contributions to the Trust Funds based upon the hours of work performed by its carpentry employees; and

WHEREAS, Area submitted contribution reports for the period January 2011 through September 2011;

WHEREAS, the Trust Funds filed a lawsuit for contributions, liquidated damages, interest and attorney fees currently pending in the United States District Court for the Northern District of Illinois, case number 11 C 1339;

WHEREAS, the parties to this Agreement have had the benefit of legal counsel and entered into this Agreement of their own free will and with full knowledge of the obligations contained herein;

THEREFORE, IN CONSIDERATION OF THE MUTUAL COVENANTS CONTAINED HEREIN, THE FOLLOWING IS AGREED:

1. **Recitals:** The recitals set forth herein are intended by the parties hereto to evidence their intent in executing this Agreement and to describe the circumstances surrounding its execution, and the parties hereto intend that this Agreement be construed in a manner consistent with the recitals. Accordingly, said recitals are, by express reference, made a part of the covenants herein, and this Agreement shall be construed in the light thereof.

2. **Payment / Contributions:** Area agrees to pay to the Trust Fund the sum of **\$320,198** representing contributions owed pursuant to the reports submitted by Area for the period January 2011 through September 2011. Payment of **\$320,198** is to be made in 10 monthly installments as follows:

\$32,019 on or before 01/15/12

\$32,019 on or before 02/15/12

\$32,019 on or before 03/15/12

\$32,019 on or before 04/15/12

\$32,019 on or before 05/15/12

\$32,019 on or before 06/15/12

\$32,019 on or before 07/15/12

\$32,019 on or before 08/15/12

\$32,019 on or before 09/15/12

\$32,027 on or before 10/15/12

3. **Payment / Liquidated Damages and Attorney Fees:** Area also agrees to pay to the Trust Funds, Plaintiff's attorney fees currently at \$9,355 and liquidated damages accrued on the contribution payments as set forth in paragraph 2. Liquidated damages assessed at 1.5% compounded monthly, shall continue to accrue on the unpaid balance of contributions until paid in full. Upon completion of the payment plan as set forth in paragraph 2, the liquidated damages will be calculated by the Trust Fund and forwarded to Area. Area agrees to pay the Plaintiff's attorney fees of \$9,355 and the accrued liquidated damages provided by the Trust Fund on or before December 1, 2012.

4. **Reporting Obligations:** Area agrees that it will remain current in submitting its monthly contribution reports and contributions as required by the collective bargaining agreement and trust agreements.

5. **Dismissal of Lawsuit:** The Trust Funds agree to have the pending lawsuit dismissed with leave to reinstate in accordance with this Agreement.

6. **Default:** In the event of default pursuant to paragraphs 2 or 4, the Trust Funds shall have the right to reinstate this case and enter judgment for the balance owed on the payment arrangement plus accrued liquidated damages and any additional attorney fees incurred by the Trust Funds as a result of enforcing this Agreement.

7. **Non-Admission of Liability:** Nothing contained in this Settlement Agreement shall be construed or implied as an admission of liability on behalf of Area, or its officers, agents, or employees.

8. **Entire Agreement:** This Settlement Agreement constitutes the entire agreement between the parties concerning the subject matter hereof and supersedes all prior and contemporaneous agreements, if any, between the parties relating to settlement of the Trust Funds' claim. In the event that any provision of this agreement is held to be invalid or unenforceable, the remaining provisions of this Agreement shall not be affected thereby, but shall continue in full force and effect.

9. **Release of Liability:** Upon final payment as set forth in paragraphs 2 and 3 of this Agreement, the Trust Funds hereby release and forever discharge Area from any and all claims of liquidated damages and interest assessed on contributions reports submitted by Area through September 2011 and any claim of the Trust Funds' attorney fees claimed through November 1, 2012 .

10. **Right to Audit:** It is expressly understood between the parties that the Trust Funds preserve and have the right to audit to verify the accuracy of the contributions reported, including the period January 2011 through September 2011, and have the right to collect any contributions shown to be owed including liquidated damages, interest, and attorney fees. This Agreement has no legal impact on these rights.

11. **Disputed Payments:** In the event all or part of a payment due under this Agreement is under dispute:

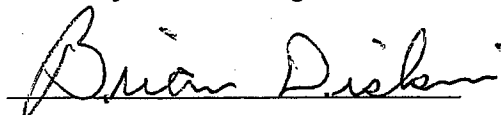
- a) The undisputed portion of the payment will be remitted in accordance with the terms of this Agreement.
- b) A written notice stating the amount and explaining the reason for the dispute will be sent to the "Trust Fund" on or before the payment due date.

Both parties agree to attempt to resolve any dispute within thirty (30) days after the date of the notice.

If the parties cannot agree to resolve any such dispute, then the dispute can be decided by a party agreed to by both parties or Magistrate Susan E. Cox pursuant to her order to retain jurisdiction in lawsuit number 11 C 1339.

12. **Execution in Counterparts:** This Agreement may be executed in multiple counterparts and each of such counterparts shall for all purposes be deemed to be an original, and all such counterparts shall together constitute one and the same instrument.

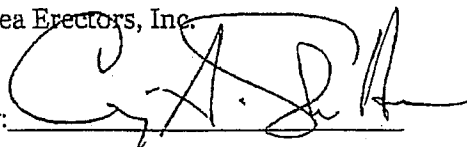
Iron Workers Tri-State Welfare Fund by
their duly authorized agent,



Brian Diskin, Chairman

Iron Workers Tri-State Welfare Fund

Area Erectors, Inc.

By: 

Print Name: CRAIG A. SHELTON
PRESIDENT

Exhibit B

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES of the IRON WORKERS)
TRI-STATE WELFARE FUND)

Plaintiffs,)

Case No. 11 C 1339

Judge Cox

v.)

AREA ERECTORS, INC.)

Defendant.)

SWORN DECLARATION PURSUANT TO 28 U.S.C.A. § 1746

Daniel P. McAnally declares as follows:

1. I am an associate of the law firm of Whitfield McGann & Ketterman and am licensed to practice law in the State of Illinois and in the U.S. Dist. Court for Northern District of Illinois, Eastern Division.

2. I have personal knowledge of the facts stated herein and if called to testify in this matter, I can competently testify to such facts from my own such knowledge.

3. On January 11, 2012, the Plaintiffs and Defendant entered into a settlement agreement, whereby the Defendant was to pay \$320,198 in partial payments, *Settlement Agreement and Release*, Exhibit A ¶2. If the Defendant defaulted on the settlement payments or failed to stay current in its monthly ERISA reporting and payment obligations, the Plaintiffs retained the right to reinstate this case and enter judgment for amounts due under the agreement, Exhibit A, ¶6.

4. I was responsible for receiving the settlement payments and forwarding them to the trust funds. The Defendant paid \$96,057 towards the settlement but failed to pay the balance owed on the settlement agreement. The balance of contributions owed is \$224,141.

5. As a result of the breach, Plaintiffs are entitled to have a judgment entered in its favor for the balance owed on the settlement, plus accrued liquidated damages at 1.5% per month, attorney fees of \$9,355 and any additional attorney fees incurred by the Trust Funds as a result of enforcing this Agreement, Exhibit A, ¶3 ¶6.

6. The contributions of \$224,141 were due for the period January 2011 through September 2011, ¶2. The liquidated damages assessed at 1.5% per month is \$3,362. The liquidated damages owed for the period October 2011 through June 2012 are \$26,896 (8 months x \$3,362).

7. As a result of the breach, the Defendant also owed attorney fees of \$9,355 and any additional attorney fees incurred by the Trust Funds as a result of enforcing this Agreement, Exhibit A, ¶3. The additional attorney fees incurred in enforcing the settlement agreement total \$5,716.25.

8. I have in excess of 19 years experience representing trustees of employee benefit plans, including the prosecution of Federal Court litigation to collect delinquent employer contributions.

9. Attorneys of this firm have expended 34.0 hours in connection with the this case at the rate of \$150 / \$165.00 / \$215.00 per hour. The total attorney fees billings for enforcing compliance is \$5,716.25.

10. I have spoken with four other lawyers from four different labor law firms who practice this type of ERISA trust fund litigation. Based on my knowledge and experience, the rates charged by the hour in this case are less than or equal to the usual and customary rates charged by other law firms doing similar work in the United States District Court for the Northern District of Illinois.

11. I certify that the attached detailed attorney fees and costs totaling \$5,716.25 were necessary and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

Date: June 13,

s/ DANIEL P. McANALLY

Attorney for the Trustees of the Iron Workers'
Welfare Plan

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Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
	9:30 a.m.		is stricken. The above-entitled cause of action is dismissed without prejudice with leave to reinstate on or before 2/15/2013. In the event a motion to reinstate is not filed on or before 2/15/2013, the case shall be deemed dismissed with prejudice without further order of the Court. Each party shall bear its own attorneys fees and costs. Enter Agreed Order of Dismissal.				
434438	TIME			DPM	0.50	165.00	82.50
1/31/2012				Billable	0.00	T@13	
Billed	G:85131	2/1/2012		IW.N8747	0.00		
			Correspondence to the fund office regarding Judge Cox's order.		0.00		
435563	TIME			DPM	0.50	165.00	82.50
2/16/2012				Billable	0.00	T@13	
Billed	G:85426	3/1/2012		IW.N8747	0.00		
			Review file for current status; correspondence to trust fund employee, Spirit Monahan regarding the trust fund claim.		0.00		
435578	TIME			DPM	1.50	165.00	247.50
2/16/2012				Billable	0.00	T@13	
Billed	G:85426	3/1/2012		IW.N8747	0.00		
			Review correspondence from trust fund employee, Spirit Monahan regarding the trust funds' claim of ERISA contributions, liquidated damages, interest and dues; various correspondence to Debbie Trzeciak, Contribution Accounting Manager, and Lori Rudnicki, Assistant Clinet Service Manager, Zenith American Solutions regarding the executed settlement agreement, breakdown of amounts owed under the promissory note and settlement agreement and monies received; note to file regarding same.		0.00		
435621	TIME			DPM	0.25	165.00	41.25
2/17/2012				Billable	0.00	T@13	
Billed	G:85426	3/1/2012		IW.N8747	0.00		
			Prepare correspondence to Trustee Baugh regarding status of the litigation and breach of the settlement agreement.		0.00		
435627	TIME			DPM	0.25	165.00	41.25
2/17/2012				Billable	0.00	T@13	
Billed	G:85426	3/1/2012		IW.N8747	0.00		
			Correspondence to Trust fund employee, Spirit Monahan regarding the trust fund claim and request for information in response to her prior email.		0.00		

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Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
435938	TIME			DPM	0.25	165.00	41.25
	2/22/2012			Billable	0.00	T@13	
	Billed	G:85426	3/1/2012	IW.N8747	0.00		
			Correspondence to Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding the January reports.		0.00		
435976	TIME			DPM	1.25	165.00	206.25
	2/22/2012			Billable	0.00	T@13	
	Billed	G:85426	3/1/2012	IW.N8747	0.00		
			Telephone conversation with Lori Rudnicki, Assistant Client Service Manager, Zenith American Solutions regarding the settlement agreement and reinstatement; telephone conference with Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding the delinquent reports for the period October 2011 through present; telephone conference with Tim Baugh regarding same; telephone conference with Daniel Aussem regarding same; telephone conference with attorney Caplis regarding the breach; develop legal strategy.		0.00		
436365	TIME			DPM	1.00	165.00	165.00
	2/28/2012			Billable	0.00	T@13	
	Billed	G:85426	3/1/2012	IW.N8747	0.00		
			Review correspondence from Iron Workers' Mid-America Pension and Supplemental Monthly Annuity regarding the October report and payment; prepare correspondence to Iron Workers' Mid-America Pension and Supplemental Monthly Annuity regarding same; prepare correspondence to Lori Rudnicki, Assistant Client Service Manager, Zenith American Solutions regarding the payment; note to file regarding same; correspondence to trustees regarding status.		0.00		
436550	TIME			DPM	2.25	165.00	371.25
	2/29/2012			Billable	0.00	T@13	
	Billed	G:85426	3/1/2012	IW.N8747	0.00		
			Prepare motion to reinstate and for prove-up and entry of judgment; prepare exhibits to the motion; prepare certificate of service and notice of motion; Prepare the document for electronic filing; electronically file the document with the U.S. Dist. Court clerk's office; prepare courtesy copy for the assigned Judge Cox.		0.00		
436551	TIME			DPM	0.25	165.00	41.25
	2/29/2012			Billable	0.00	T@13	
	Billed	G:85426	3/1/2012	IW.N8747	0.00		
			Telephone conference with Daniel Aussem		0.00		

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Slip ID Dates and Time Posting Status Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
regarding the motion to reinstate and breach of the settlement agreement.				
436575 3/2/2012 Billed Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding NOTICE of Motion by Daniel P. McAnally for presentment of motion for order[27] before Honorable Susan E. Cox on 3/6/2012 at 09:30 AM.MOTION by Plaintiff Trustees of the Iron Workers Tri-State Welfare Fund for order of reinstatement (Attachments: # (1) Exhibit); download documents to the file folder; print document and enclose in file.	TIME DPM Billable G:85763 4/2/2012 IW.N8747	0.25 0.00 0.00 0.00	165.00 T@13	41.25
436581 2/29/2012 Billed Telephone conference with attorney Caplis regarding the motion and breach.	TIME DPM Billable G:85426 3/1/2012 IW.N8747	0.25 0.00 0.00 0.00	165.00 T@13	41.25
437082 3/5/2012 Billed Prepare for court status/motion hearing; review file for current status and most recent activity; telephone conversation with trust fund regarding status of the litigation; review court docket to confirm that the case will be called for status.	TIME DPM Billable G:85763 4/2/2012 IW.N8747	0.25 0.00 0.00 0.00	165.00 T@13	41.25
437084 3/5/2012 Billed Review correspondence from attorney Caplis regarding the settlement payment; telephone conference with Caplis regarding same.	TIME DPM Billable G:85763 4/2/2012 IW.N8747	0.50 0.00 0.00 0.00	165.00 T@13	82.50
437085 3/5/2012 Billed Prepare for court status/motion hearing; review file for current status and most recent activity; telephone conversation with trust fund regarding status of the litigation; review court docket to confirm that the case will be called for status.	TIME DPM Billable G:85763 4/2/2012 IW.N8747	0.25 0.00 0.00 0.00	165.00 T@13	41.25
437086 3/6/2012 Billed Attend court appearance at the U.S. District Court for the Northern District of Illinois before Judge	TIME DPM Billable G:85763 4/2/2012 IW.N8747	1.00 0.00 0.00 0.00	165.00 T@13	165.00

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Slip ID	ATTORNEY		Units	Rate	Slip Value
Dates and Time	Activity		DNB Time	Rate Info	
Posting Status	Case		Est. Time	Bill Status	
Description	Reference		Variance		
Cox.					
437087	TIME	DPM	0.50	165.00	82.50
3/6/2012		Billable	0.00	T@13	
Billed	G:85763	4/2/2012 IW.N8747	0.00		
Telephone conference with Jack Keck regarding status of the litigation; telephone conference with Lori Rudnicki, Assistant Clinet Service Manager, Zenith American Solutions regarding payment pursuant to the settlement agreement.			0.00		
437270	TIME	DPM	0.25	165.00	41.25
3/8/2012		Billable	0.00	T@13	
Billed	G:85763	4/2/2012 IW.N8747	0.00		
Telephone conference with Daniel Aussem regarding status of the breach of settlement agreement.			0.00		
437368	TIME	DPM	1.00	165.00	165.00
3/9/2012		Billable	0.00	T@13	
Billed	G:85763	4/2/2012 IW.N8747	0.00		
Telephone conference with Daniel Aussem regarding the status of the litigation and settlement agreement; telephone conference with Jack Keck regarding same; telephone conference with Lori Rudnicki, Assistant Clinet Service Manager, Zenith American Solutions regarding same; note to file regarding same.			0.00		
437370	TIME	DPM	1.25	165.00	206.25
3/12/2012		Billable	0.00	T@13	
Billed	G:85763	4/2/2012 IW.N8747	0.00		
Telephone conference with Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding the outstanding reports; develop legal strategy; telephone conference with Lori Rudnicki, Assistant Clinet Service Manager, Zenith American Solutions regarding same; correspondence to Trzeciak regarding same; telephone conference with Jack Keck regarding same.			0.00		
437426	TIME	DPM	0.50	165.00	82.50
3/13/2012		Billable	0.00	T@13	
Billed	G:85763	4/2/2012 IW.N8747	0.00		
Review correspondence from the defendant / signatory regarding payment for \$32,019.00' prepare correspondence to Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding same; note to file regarding same.			0.00		

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437780	TIME			DPM	0.25	165.00	41.25
	3/13/2012			Billable	0.00	T@13	
	Billed	G:85763	4/2/2012	IW.N8747	0.00		
			Review correspondence from Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding her review of the reports; download the documents, print and enclose in the file.		0.00		
437782	TIME			DPM	0.25	165.00	41.25
	3/15/2012			Billable	0.00	T@13	
	Billed	G:85763	4/2/2012	IW.N8747	0.00		
			Review correspondence from Lori Rudnicki, Assistant Clinet Service Manager, Zenith American Solutions regarding the liquidated damages calculation in the Area Erectors breach.		0.00		
437785	TIME			DPM	2.25	165.00	371.25
	3/20/2012			Billable	0.00	T@13	
	Billed	G:85763	4/2/2012	IW.N8747	0.00		
			Review correspondence from Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding the trust funds' claim of ERISA contributions; Review voice mail message from Kevin Caplis regarding the status of the payments; calculate the trust fund claim including the delinquent reports and payments, breach of settlement agreement and liquidated damages; prepare correspondence to Caplis regarding the trust funds' claim of ERISA contributions and liquidated damages and action to be taken before Judge Cox; prepare correspondence to the delinquency committee meeting regarding status; correspondence to Zenith regarding same.		0.00		
437846	TIME			DPM	0.25	165.00	41.25
	3/20/2012			Billable	0.00	T@13	
	Billed	G:85763	4/2/2012	IW.N8747	0.00		
			Review correspondence from Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding the Local 111 reports and inclusion in the claim; correspondence to Trzeciak regarding same.		0.00		
437860	TIME			DPM	0.50	165.00	82.50
	3/20/2012			Billable	0.00	T@13	
	Billed	G:85763	4/2/2012	IW.N8747	0.00		
			Telephone conference with attorney Caplis regarding the breach and resolution; note to file regarding same.		0.00		
437927	TIME			DPM	1.00	165.00	165.00
	3/21/2012			Billable	0.00	T@13	
	Billed	G:85763	4/2/2012	IW.N8747	0.00		

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Slip ID	ATTORNEY	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Case	Est. Time	Bill Status	
Description	Reference	Variance		
Review correspondence from Area Erectors regarding payment per the settlement agreement; prepare correspondence to Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding same; telephone conference with attorney Caplis regarding same; prepare for court status/motion hearing; review file for current status and most recent activity; telephone conversation with attorney Caplis regarding status of the litigation; review court docket to confirm that the case will be called for status; confer with Richard Oginski, Field Representative, trust fund office regarding handling and for future legal strategy.		0.00		
438128	TIME	RTO	1.00	215.00
3/22/2012		Billable	0.00	T@13
Billed	G:85763	4/2/2012 IW.N8747	0.00	
Appear for status on the Area Erector case			0.00	
438594	TIME	DPM	0.25	165.00
3/10/2012		Billable	0.00	T@13
Billed	G:85763	4/2/2012 IW.N8747	0.00	
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before Honorable Susan E. Cox: Motion hearing held. Plaintiff's motion for order of reinstatement is entered and continued to 3/22/12 at 9:30 a.m. to allow parties to complete an audit of payments. ; download documents to the file folder; print document and enclose in file.			0.00	41.25
438646	TIME	DPM	0.25	165.00
3/29/2012		Billable	0.00	T@13
Billed	G:85763	4/2/2012 IW.N8747	0.00	
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before Honorable Susan E. Cox: Motion hearing held. Plaintiff's motion for order of reinstatement is entered and continued. Parties are continuing their efforts to reconcile any remaining payment issues. Status hearing set for 4/11/12 at 9:30 a.m. ; download documents to the file folder; print document and enclose in file.			0.00	41.25
439311	TIME	DPM	0.50	165.00
4/10/2012		Billable	0.00	T@13
Billed	G:86054	5/1/2012 IW.N8747	0.00	
Review correspondence from Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding the trust fund claim; prepare for court status/motion hearing; review file for current status and most recent activity; telephone conversation			0.00	82.50

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Slip ID	ATTORNEY	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Case	Est. Time	Bill Status	
Description	Reference	Variance		
with trust fund regarding status of the litigation; review court docket to confirm that the case will be called for status.				
439547	TIME	DPM		
4/9/2012		Billable	165.00	123.75
Billed	G:86054 5/1/2012 IW.N8747	0.00	T@13	
Telephone conference with attorney Caplis regarding the court status hearing; prepare for the court status hearing; review correspondence from Caplis regarding Area's position regarding the trust fund claim; note to file regarding same.		0.00		
439548	TIME	DPM		
4/11/2012		Billable	165.00	165.00
Billed	G:86054 5/1/2012 IW.N8747	0.00	T@13	
Attend court appearance at the U.S. District Court for the Northern District of Illinois before Judge Cox.		0.00		
439593	TIME	DPM		
4/13/2012		Billable	165.00	41.25
Billed	G:86054 5/1/2012 IW.N8747	0.00	T@13	
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before Honorable Susan E. Cox: Status hearing held. The Court was informed of the parties efforts to reconcile outstanding payment issues. Plaintiffs' motion for order of reinstatement is entered and continued generally. Status hearing set for 4/25/12 at 9:30 a.m. at which time the parties will set a prove-up hearing date. ; download documents to the file folder; print document and enclose in file.		0.00		
439643	TIME	DPM		
4/16/2012		Billable	165.00	165.00
Billed	G:86054 5/1/2012 IW.N8747	0.00	T@13	
Review correspondence from attorney Caplis regarding the response to the fund claim; analyze response; correspondence to Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding same.		0.00		
439798	TIME	DPM		
4/18/2012		Billable	165.00	165.00
Billed	G:86054 5/1/2012 IW.N8747	0.00	T@13	
Telephone conference with Daniel Aussem regarding the status of the Area Erectors case; telephone conference with attorney for other debtor regarding the possibility of an involuntary bankruptcy.		0.00		

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Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
439898	TIME			DPM	2.00	165.00	330.00
	4/19/2012			Billable	0.00	T@13	
	Billed	G:86054	5/1/2012	IW.N8747	0.00		
			Review correspondence from Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. regarding analysis of Area's position; review and prepare trust fund claim; telephone conference with attorney Caplis regarding same.		0.00		
439899	TIME			DPM	1.00	165.00	165.00
	4/19/2012			Billable	0.00	T@13	
	Billed	G:86054	5/1/2012	IW.N8747	0.00		
			Prepare the Iron Workers' Mid-State Welfare Quarterly Board of Trustees Meeting; review prior minutes; prepare the Whitfield McGann & Ketterman litigation status report; review Bureau Sign report; review the Iron Workers' Mid-America Pension and Supplemental Monthly Annuity report; review the appendix; prepare outline of issues.		0.00		
440397	TIME			DPM	0.25	165.00	41.25
	4/27/2012			Billable	0.00	T@13	
	Billed	G:86054	5/1/2012	IW.N8747	0.00		
			Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before Honorable Susan E. Cox: Pursuant to a request by plaintiffs' counsel and there being no objection by defendant's counsel, status hearing set for 4/25/12 at 9:30 a.m. is stricken. Status hearing set for 5/2/12 at 9:30 a.m. ; download documents to the file folder; print document and enclose in file.		0.00		
440398	TIME			DPM	0.25	165.00	41.25
	4/25/2012			Billable	0.00	T@13	
	Billed	G:86054	5/1/2012	IW.N8747	0.00		
			Telephone conference with minute clerk / courtroom deputy regarding the court status hearing and for continuance.		0.00		
440961	TIME			TJK	1.75	150.00	262.50
	5/2/2012			Billable	0.00	T@13	
	Billed	G:86385	6/1/2012	IW.N8747	0.00		
			Court appearance for status hearing. Conference with attorney Kevin Caplis regarding consent judgment and the financial affairs of the company. Follow-up conference with Daniel P McAnally regarding the court appearance and the company's position.		0.00		

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Slip Listing

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Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity	Case Reference	Units DNB Time	Rate Rate Info	Slip Value
						Est. Time	Bill Status	
						Variance		
441000	TIME			DPM		0.50	165.00	82.50
5/1/2012				Billable		0.00	T@13	
Billed	G:86385	6/1/2012	IW.N8747			0.00		
Telephone conference with attorney Caplis regarding preparation for the court status hearing and request for consent judgment; confer with attorney Travis J. Kettermann for handling court status hearing.						0.00		
441184	TIME			DPM		0.25	165.00	41.25
5/5/2012				Billable		0.00	T@13	
Billed	G:86385	6/1/2012	IW.N8747			0.00		
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before Honorable Susan E. Cox: Status hearing held; status hearing set for 6/6/12 at 9:30 a.m. to allow the parties more time to work toward possible resolution of the pending motion for an order of reinstatement; download documents to the file folder; print document and enclose in file.						0.00		
441476	TIME			DPM		0.25	165.00	41.25
5/10/2012				Billable		0.00	T@13	
Billed	G:86385	6/1/2012	IW.N8747			0.00		
Telephone conference with Daniel Aussem regarding status of the litigation.						0.00		
442348	TIME			DPM		2.25	165.00	371.25
5/29/2012				Billable		0.00	T@13	
Billed	G:86385	6/1/2012	IW.N8747			0.00		
Review correspondence from Debbie Trzeciak, Contribution Accounting Manager, APBA Inc. and Fred Bunnell, American Benefit Plan Administrators regarding the trust fund claim; telephone conference with Trzeciak regarding same; telephone conference with attorney Caplis regarding same; calculate amounts owed in preparation for the court status hearing.						0.00		
442479	TIME			DPM		2.00	165.00	330.00
5/30/2012				Billable		0.00	T@13	
Billed	G:86385	6/1/2012	IW.N8747			0.00		
Prepare prove up document and proposed judgment order.						0.00		
443332	TIME			DPM		1.00	165.00	165.00
6/6/2012				Billable		0.00	T@13	
WIP				IW.N8747		0.00		
Attend court appearance at the U.S. District Court for the Northern District of Illinois before Judge Cox.						0.00		

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Slip ID	ATTORNEY	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Case	Est. Time	Bill Status	
Description	Reference	Variance		
443334	DPM	0.75	165.00	123.75
6/5/2012	Billable	0.00	T@13	
WIP	IW.N8747	0.00		
Prepare for court status/motion hearing; review file for current status and most recent activity; telephone conversation with trust fund regarding status of the litigation; review court docket to confirm that the case will be called for status; telephone conference with attorney Caplis regarding same.		0.00		
		31.0		
Grand Total				
		Billable	149.00	19700.00
		Unbillable	0.00	0.00
		Total	149.00	19700.00

Prepare motion for
Entry of judgment;

2.0

165.00
x 2
1176.25

Court appearance
June 20, 2012

1.0 | 165.00
31.0

\$ 5716.25